

December 6, 2019

Toronto Board of Health
c/o City Clerk's Office
100 Queen St. W., 10th fl. W.
Toronto, ON M5H 2N2

Re. item HL12.3: Aerosolized Liquid Products (Vapour Products)

Dear members of the Board of Health:

The Centre for Addiction and Mental Health (CAMH) is pleased to support the recommendations of the Medical Officer of Health (MOH) regarding aerosolized liquid products (vapour products).

The use of vapour products, also known as e-cigarettes, has been increasing. CAMH data shows that about 9% of adults¹ and 11% of high-school students² reported using e-cigarettes in 2017, and these numbers have likely risen since then, especially among youth.³ As detailed in the MOH's report, while e-cigarettes appear to be less harmful than traditional (combustible) cigarettes, their use comes with significant short-term health risks and their long-term effects are not yet known. Further, there is evidence that some youth are taking up vaping, developing a nicotine dependence, and moving on to smoking.

The MOH's recommendations address two important factors in the growing popularity of e-cigarettes among youth: flavoured products and advertising. Flavours such as fruit, candy and dessert are especially popular among youth,⁴ and such flavours have been cited by youth as a reason for initiating e-cigarette use.⁵ The federal *Tobacco and Vaping Products Act* places certain restrictions on advertising, including a ban on the promotion of vaping products and flavours that could appeal to youth, and the provincial government plans to amend the *Smoke-Free Ontario Act* to prohibit the promotion of any vapour products in retail stores accessible to minors. However, such products are widely available for sale in stores accessible to minors. Further, promotion of youth-appealing flavours seems to be common among Canadian online retailers.⁶

For these reasons we endorse the recommendations of the Medical Officer of Health, and in particular, that the Board of Health:

- request the Government of Ontario to amend the *Smoke-Free Ontario Act* by adding a prohibition on the sale of any flavoured vapour products, with the exception of tobacco flavour, in stores accessible to minors, and
- request the Government of Canada and the Federal Minister of Health to take prompt action to implement restrictions on the advertising and promotion, flavours, and nicotine content of vapour products.

For more information, please contact:

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camh The Centre for Addiction and Mental Health (CAMH) is Canada's largest mental health and addiction teaching hospital and one of the world's leading research centres in this field. CAMH is committed to playing a leading role in transforming society's understanding of mental illness and substance use and building a better health care system. To help achieve these goals, CAMH communicates evidence-informed policy advice to stakeholders and policymakers.

¹ Ialomiteanu, Hamilton, Adlaf, & Mann (2018). CAMH Monitor e-report: substance use, mental health and well-being among Ontario adults, 1977–2017. Toronto, ON: Centre for Addiction and Mental Health.

² Boak, Hamilton, Adlaf, & Mann (2017). Drug use among Ontario students, 1977-2017: detailed findings from the Ontario Student Drug Use and Health Survey. Toronto: Centre for Addiction and Mental Health.

³ Hammond et al. (2019). Prevalence of vaping and smoking among adolescents in Canada, England, and the United States: repeat national cross sectional surveys. *BMJ*, 365, l2219.

⁴ Ontario Tobacco Research Unit (2019). Promotion of flavoured vaping products that appeal to youth. Available at https://www.otru.org/wp-content/uploads/2019/04/otru_projectnews_apr2019.pdf

⁵ Health Canada (2019). Reducing youth access and appeal of vaping products: consultation on potential regulatory measures. Available at <https://www.canada.ca/content/dam/hc-sc/documents/programs/consultation-reducing-youth-access-appeal-vaping-products-potential-regulatory-measures/consultation-reducing-youth-access-appeal-vaping-products-potential-regulatory-measures-eng.pdf>

⁶ Ontario Tobacco Research Unit, 2019

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